

IN THE U.S. DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

| | | |
|--|---|-----------------------|
| APRIL BAYLIS, | : | |
| | : | |
| Plaintiff, | : | |
| | : | |
| v. | : | C. A. No. 04-1462-KAJ |
| | : | |
| RED LION GROUP, INC., a corporation of | : | |
| the State of Pennsylvania, | : | |
| | : | |
| Defendant. | : | |

NOTICE OF RECORDS DEPOSITION*

To: Bayard Marin, Esquire
521 West Street
Wilmington, DE 19801

PLEASE TAKE NOTICE that the undersigned will take the records deposition* of the following persons on July 1, 2005 at 2:00 p.m. in the office of Marks, O'Neill, O'Brien & Courtney, P.C., 913 North Market Street, Suite 800, Wilmington, Delaware 19801:

Custodian of Records
Saveway Pharmacy
Attn: Calvin Freedman, RPH
31 Albe Drive
Glasgow, DE 19702

/S/ Norman H. Brooks, Jr.
NORMAN H. BROOKS, JR. (No. 2568)
Marks, O'Neill, O'Brien & Courtney, P.C.
913 North Market Street, Suite 800
Wilmington, DE 19801
(302) 658-6538
Attorney for Defendant

DATED: June 14, 2005

*DUCES TECUM - Deponent is to bring with them all documents in their possession pertaining to **April Baylis**, including all physician's handwritten notes, typed office notes,

patient information reports, diagnostic testing, prescriptions, billing ledgers, etc. Please do not bring with you or deliver any x-ray films, MRI films or other such films, but only written reports of such radiographic studies. **Deponent's appearance at the scheduled deposition will be waived if copies of the subpoenaed documents are furnished to Norman H. Brooks, Jr., Esquire on or before June 30, 2005.**